

State of Utah

**GARY HERBERT** Governor

**GREG BELL** Lieutenant Governor

## Department of **Environmental Quality**

Amanda Smith Executive Director

DIVISION OF SOLID AND HAZARDOUS WASTE Scott T. Anderson Director

Solid and Hazardous Waste Control Board

Kevin Murray, Chair Dennis Riding, Vice-Chair Jeff Coombs, MPH, LEHS Eugene Cole, DrPH Mark Franc Brett Mickelson Amanda Smith Shane Whitney Dwayne Woolley Scott T. Anderson **Executive Secretary** 

June 25, 2013

Stuart L. Green, Senior Vice President American Gilsonite Bonanza Minesite 29950 South Bonanza Highway Bonanza, Utah 84008

RE: Landfill Inspection

Dear Mr. Green:

Representatives of the Division of Solid and Hazardous Waste inspected the closed American Gilsonite-Bonanza landfill on June 13, 2013. The cooperation and help of Leah Phillips of your staff was appreciated. Due to the cap of the closed landfill being several hundred feet below the surface elevation and due to the dangerous nature of the open mine trench, an inspection was not performed. The inspection report is enclosed.

Since the location of the landfill is in the bottom of the mined out trench, we suggest that American Gilsonite consider terminating post-closure activities as future maintenance and monitoring are not likely to change the integrity of the cap covering the waste at the bottom of the mined out trench. To terminate post-closure care of the landfill, American Gilsonite would need to obtain certification from a professional engineer registered in Utah that post-closure activities, maintenance and monitoring are no longer necessary at the landfill in accordance with R315-302-3(7)(b) and(c), due to the conditions mentioned above.

If you have any questions, please call Wade Hansen or Doug Taylor at (801) 536-0200.

Sincerely,

Scott T. Anderson, Director

Division of Solid and Hazardous Waste

STA/DT/kk

Enclosure(s)

c: Dean Richens, Environmental Manager, American Gilsonite – Bonanza Minesite Joseph B. Shaffer, MA, MBA, EHS, Health Officer, Tri-County Health Department Darrin Brown, LEHS, Environmental Health Director, Tri-County Health Department Scott Hacking, P.E., District Engineer Paul Baker, Minerals Manager, Utah Division of Oil, Gas and Mining

## SOLID WASTE FACILITY INSPECTION REPORT CHECKLIST UTAH DIVISION OF SOLID & HAZARDOUS WASTE

□ 1.1 Permit Review □ 2.14 Other   □ 1.2 Annual Report Review □ 3.1 Other   □ 1.4 Facility Contacts Confirmed □ 3.1 Operating Days / Hrs.   □ 1.5 Facility Contacted (if announced inspection) □ 3.2 Directions & Procedure   □ 3.3 Emergency Numbers □ 3.4 List of Unacceptable Materials   □ 3.5 Other	Facility Name American Gilsonite - Bonanza Closed Class IIIb Land	fill County Uinitah
Routine Oversight  Inanounced  Weather Conditions  Clear, warm and windy  Inspection Goal  To determine the age of the landfill is intact  Facility Contact  Stuart Green, VP American Gilsonite  Stuart Green Gilsonite  Stuart Green Gilsonite  Stuart Green Gilsonite  Stuart Green Green Gilsonite  Stuart Green Gilsonite  Stuart Green Green Green Gilsonite  Stuart Green Green Green	Location Approximately 2.5 miles north east of the American Gilson	nite Facility which is 35 miles south of Vernal, Utah on Highway 45.
Announced Unannounced Unannounced Weather Conditions Inspection Goal To determine the cap of the landfill is intact Participants Leah Phillips, American Gilsonite Participants Leah Phillips, American Gilsonite Ralph Bohn and Doug Taylor, DSHW FOLLOW UP INSPECTION NEEDED Yes No Recommended Follow Up Date    New York	Inspection Date 6/13/2012 Time In 11:00 am Tim	ne Out 11:30 am
To determine the cap of the landfill is intact   Facility Contact   Staurt Green, VP American Gilsonite   Participants   Leah Phillips, American Gilsonite; Ralph Bohn and Doug Taylor, DSHW	Routine Oversight  Follow up  Monitoring Evalua	tion Facility Status Construction Review
Facility Contact Stuart Green, VP American Gilsonite Participants Leah Phillips, American Gilsonite; Ralph Bohn and Doug Taylor, DSHW FOLLOW UP INSPECTION NEEDED Yes No Recommended Follow Up Date  (X - indicates items reviewed)  1. PRE-INSPECTION REVIEW  1. 1. Permit Review  1. 1. Permit Review  1. 1. Permit Review  1. 1. Permit Review  3. SIGNS REQUIRED / PROPERLY POSTED  3. J Operating Days / Hrs.  3. J Directions & Procedure  3. J Operating Days / Hrs.  3. J Directions & Procedure  3. J Operating Days / Hrs.  4. J Directions & Procedure  5. J Directions & Procedure  6. J Directions & Procedure  7. J Directions & Procedure  7. J Directions & Proced	Announced Unannounced Weather Conditions	Clear, warm and windy
Facility Contact Stuart Green, VP American Gilsonite Participants Leah Phillips, American Gilsonite; Ralph Bohn and Doug Taylor, DSHW FOLLOW UP INSPECTION NEEDED Yes No Recommended Follow Up Date  (X - indicates items reviewed)  1. PRE-INSPECTION REVIEW  1.1. Permit Review  1.2. Annual Report Review  1.3. Previous Inspection Review  3. SIGNS REQUIRED / PROPERLY POSTED  3. J Operating Days / Hrs.  3. J Directions & Procedure  3. J Operating Days / Hrs.  3. J Directions & Procedure  3. J Operating Days / Hrs.  4. J Directions & Procedure  5. J Directions & Procedure  6. J Directions & Procedure	Inspection Goal To determine the cap of the landfill is intact	
Participants Leah Phillips, American Gilsonite; Ralph Bohn and Doug Taylor, DSHW FOLLOW UP INSPECTION NEEDED Yes No Recommended Follow Up Date    No Recommended Follow Up Date		
No   Recommended Follow Up Date		Taylor, DSHW
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1.1 Permit Review		
1.1 Permit Review	(X - indicates item	s reviewed)
1.2 Annual Report Review     2.14 Other     3. SIGNS REQUIRED / PROPERLY POSTED     3.1 Operating Days / Hrs.     3.2 Directions & Procedure     3.2 Directions & Procedure     3.3 Emergency Numbers     3.4 List of Unacceptable Materials     3.5 Other       3.5 Other	1. PRE-INSPECTION REVIEW	
1.2 Annual Report Review   1.3 Previous Inspection Review   3. SIGNS REQUIRED / PROPERLY POSTED   3.1 Operating Days / Hrs.   3.2 Directions & Procedure   3.2 Directions & Procedure   3.3 Emergency Numbers   3.4 List of Unacceptable Materials   3.4 List of Unacceptable Materials   3.5 Other   3.4 List of Unacceptable Materials   3.5 Other   4.2 Training   4.1 On-site while open   4.2 Training   4.3 Other   4.3 Other   5.2 Random Inspections   5.3 Leachate   5.3 Leachate   5.3 Leachate   5.4 Ground Water   5.5 Other   5.5 Othe	1.1 Permit Review	☐ 2.14 Other
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1.4 Facility Contacted (if announced inspection)   1.5 Facility Contacted (if announced inspection)   1.6 Local Heath Contacted   1.7 Other   3.2 Directions & Procedure   3.3 Emergency Numbers   3.4 List of Unacceptable Materials   3.5 Other   3.5 Other   3.6 Communications   4.1 On-site while open   4.2 Training   4.3 Other   4.3 Other   4.3 Other   5.1 Methane   5.2 Random Inspections   5.3 Leachate   5.4 Ground Water   5.5 Other   5.5 Other	1.3 Previous Inspection Review	
3.2 Directions & Procedure     1.5 Facility Contacted (if announced inspection)     1.6 Local Heath Contacted     1.7 Other     3.4 List of Unacceptable Materials     3.5 Other     3.6 Communications     2.1 Litter     2.2 Roads     2.3 Gate House Operations     2.4 Vectors     2.5 Communications     2.6 Recycling Area     2.7 Fugitive Dust Control     2.8 Waste Inspection Area     2.9 Scavenging Control     2.10 Open Burning     2.11 Fences, Gates, Locks, Access Control Landfill area is fenced with signs     2.12 Working Face     3.2 Directions & Procedure     3.3 Emergency Numbers     3.4 List of Unacceptable Materials     3.5 Other     4.1 On-site while open     4.2 Training     4.3 Other     5.1 Methane     5.2 Random Inspections     5.3 Leachate     5.4 Ground Water     5.5 Other     6.1 Water Run-on     6.1 Water Run-on     6.1 Water Run-on     6.1 Water Run-on     6.2 Waste Run-on     6.3 Water Run-on     6.4 Water Run-on     6.5 Water Run-on     6.7 Water Run-on     6.7 Water Run-on     6.7 Water Run-on     7.8 Waste Inspection & Procedure     1.6 Water Run-on     1.6 Water Run-on     1.7 Water Run-on     1.8 Water	☐ 1.4 Facility Contacts Confirmed	13.1 Operating Days / Hrs.
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1.7 Other     3.5 Other		3.4 List of Unacceptable Materials
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2.2 Roads	2. FACILITY / OPERATIONAL CONTROLS	
2.3 Gate House Operations	2.1 Litter	4. OPERATOR / REPRESENTATIVE / EMPLOYEES
□         2.3 Gate House Operations           □         2.4 Vectors           □         2.5 Communications           □         2.6 Recycling Area           □         5.1 Methane           □         5.2 Random Inspections           □         2.8 Waste Inspection Area           □         2.9 Scavenging Control           □         2.10 Open Burning           □         2.11 Fences, Gates, Locks, Access Control           Landfill area is fenced with signs         □           □         2.12 Working Face	☐ 2.2 Roads	4.1 On-site while open
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□         2.5 Communications           □         2.6 Recycling Area           □         5.1 Methane           □         5.2 Random Inspections           □         5.3 Leachate           □         5.4 Ground Water           □         5.5 Other           □         2.11 Fences, Gates, Locks, Access Control           Landfill area is fenced with signs         6. DRAINAGE / EROSION           □         6.1 Water Run-on	2.3 Gate House Operations	4.2 Haming
□ 2.5 Communications   □ 2.6 Recycling Area □ 5.1 Methane   □ 2.7 Fugitive Dust Control □ 5.2 Random Inspections   □ 2.8 Waste Inspection Area □ 5.3 Leachate   □ 2.9 Scavenging Control □ 5.4 Ground Water   □ 2.10 Open Burning □ 5.5 Other   ☑ 2.11 Fences, Gates, Locks, Access Control   Landfill area is fenced with signs 6. DRAINAGE / EROSION   □ 2.12 Working Face □ 6.1 Water Run-on	☐ 2.4 Vectors	4.3 Other
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□ 2.9 Scavenging Control   □ 2.10 Open Burning   □ 5.5 Other      5.5 Other	2.7 Fugitive Dust Control	5.2 Random Inspections
□ 2.9 Scavenging Control   □ 2.10 Open Burning   □ 5.5 Other      5.5 Other	7 2 Waste Inspection Area	☐ 5.3 Leachate
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Landfill area is fenced with signs  6. DRAINAGE / EROSION  6.1 Water Run-on  6.1 Water Run-on		
2.12 Working Face 6.1 Water Run-on		
☐ 2.13 Leachate Collection System ☐ 6.2 Water Run-off		O.1 Water Run-on
	2.13 Leachate Collection System	6.2 Water Run-off

## SOLID WASTE FACILITY INSPECTION REPORT

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6.3 Other	Placed on waste at the bottom of the trench
	9.8 Self Inspection (Quarterly) Reports
ROPER STORAGE / ISOLATION / DISPOSAL	
7.1 Special Waste	9.9 Deviation from Plans
7.2 Batteries	
7.2 Batteries	9.10 Permit, Permit Application and Rules Available
7.3 Hazardous Waste	9.11 Other
	7.11 Oute
7.4 Infectious Waste	
	10. MONITORING / SAMPLING / ANALYSIS RECORD
7.5 Tires	10.1 Explosive Gas Monitoring
I aco	
7.6 Dead Animals	☐ 10.2 Leachate Sampling & Treatment
7.7 Asbestos	☐ 10.3 Ground Water Sampling Results
1.1 Asocstos	10.5 Ground water Sampling Results
7.8 Bulky Waste	□ 10.4 Other
	The state of the s
7.9 Contaminated Soil	
	11. SPECIAL WASTE RECORDS
7.10 Ash	11.1 Lab Analysis Results
7.11 Sludge	11.2 Manifests
7.12 Other	☐ 11.3 Treatment Certification
7.12 Oute	11.5 Treatment certification
	11.4 Paint Filter Test Results
COVER	
8.1 Daily - Soil	☐ 11.5 Onsite Treatment Documentation
8.2 Daily - Alternative	11.6 Other
8.3 Intermediate	
1 6.5 Intermediate	12. SPECIAL PERMIT REQUIREMENTS
8.4 Final	12. SPECIAL PERMIT REQUIREMENTS
aste has been covered	
8.5 Vegetation	12.2
8.6 Other	12.3
NSPECTION DECORDS	
NSPECTION RECORDS  9.1 Random Inspection Report	13. OTHER ITEMS  13.1 Notice of Inspections Form Completed and Signed
- Total South Mayorton Report	13.1 Notice of hispections Form Completed and Signed
9.2 Gas Monitoring System	□ 13.2
9.3 Surface Drainage Control	□ 13.3
9.4 Daily Records	. 13.4
0.5 W-i-la - V-1	
9.5 Weight or Volumes	13.5
9.6 Intermediate Cover	
7.0 Intermediate Cover	
//52	
IW Inspector Signature:	iles

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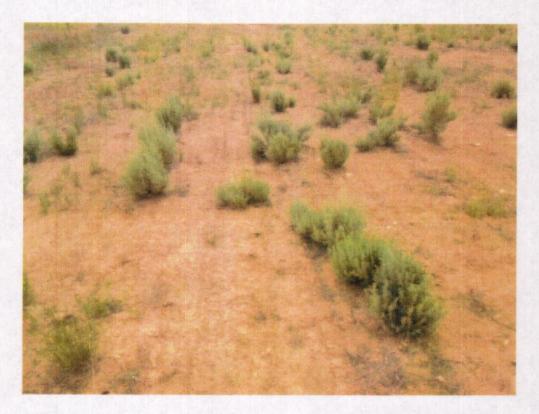
American Gilsonite Closed Class IIIb Landfill Inspection Photos June 13, 2013



View west of the reclaimed area adjacent to the landfill in the mined out trench



View south of the landfill



New sagebrush growing on the reclaimed adjacent to the mind trench



View south showing the closed landfill in the mine trench



View northwest of the reclaimed area adjacent to the mine trench



View southeast of the reclaimed area adjacent to the mine trench